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Attorney for Defendant Huante-Hernandez

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE WILLIAM Q. HAYES)

UNITED STATES OF AMERICA,

Plaintiff,

v.

DALIA HUANTE-HERNANDEZ

Defendant.

Criminal Case No. 08-CR-0351-WQH

Date: April 1, 2008

Time: 2:00 p.m.

DEFENDANT'S NOTICE OF MOTIONS
AND MOTIONS TO:
1) COMPEL DISCOVERY; AND
2) GRANT LEAVE TO FILE
FURTHER MOTIONS

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY; and
CHRISTOPHER ALEXANDER, ASSISTANT UNITED STATES ATTORNEY

PLEASE TAKE NOTICE that on Monday April 1, 2008 at 2:00 p.m., or as soon
thereafter as counsel may be heard, the defendant, Dalia Huante-Hernandez, by and through
her counsel Wendy S. Gerboth, will move this Court to compel discovery and grant leave to
file further motions after discovery is complete.

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MOTIONS

The defendant, Dalia Huante-Hernandez, by and through her counsel Wendy S. Gerboth, pursuant to Fed. R. Crim. P. 12, 16 and 26.2 and Title 21, United States Code Sections 952 and 960, and the First, Fourth, Fifth and Sixth Amendments to the United States Constitution, hereby moves this Court to compel discovery and grant leave to file further motions after discovery is complete.

These motions are based upon the instant motions, the notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-entitled cause, and any and all other information that may be brought to the Court's attention prior to or during the hearing on these motions.

Respectfully submitted,

Dated: March 24, 2008

/s/ Wendy S. Gerboth
WENDY S. GERBOTH
Attorney for Defendant Huante